

### **REMARKS**

Claim 1, 2 and 4-17 are pending in the present application. Reconsideration of this application, in view of the following remarks is respectfully requested.

#### **Interview with the Examiner**

An interview was conducted with the Examiner in charge with the above-identified application on August 11, 2005. Applicants representative greatly appreciates the courtesy shown by the Examiner during the interview. In the interview with the Examiner, the Examiner's rejection under 35 U.S.C. § 103 in view of the Pang et al. and Gosh et al. reference was discussed. In particular, it was explained to the Examiner that the Pang et al. and Gosh et al. references fail to disclose an application program that converts primary data into secondary data that is in a form that is different from the first form as recited in independent claim 1. In addition, the Pang et al. and Gosh et al. references fail to disclose an application program that converts primary data to secondary data, the secondary data being compatible with a second software program different from the first software program as recited in independent claim 15.

The Examiner indicated that the comments would be further considered once a reply to the Office Action has been filed. Applicants submit that the following comments address the Examiner's rejection. It is requested that the Examiner reconsider and withdraw the rejection under 35 U.S.C. § 103(a) for the reasons explained below.

### **Rejection Under 35 U.S.C. § 103**

Claims 1, 2 and 4-17 stand rejected under 35 U.S.C. d§ 103(a) as being unpatentable over Pang et al., USPN 6,578,188 in view of Gosh et al., USPN 6,741,265. This rejection is respectfully traversed.

The present invention is directed to a method for providing data-processing service. Independent claim 1 recites a combination of steps including the recitation “said application program converting the primary data having a first form to secondary data having a second form different from the first form.” Independent claim 15 recites a combination of steps including the recitation “wherein the primary data is compatible with a first software program and the secondary data is compatible with a second software program different from the first software program.” The Examiner appears to recognize that the Pang et al. reference fails to disclose these aspects of the present invention; however, the Examiner relies on the Gosh et al. reference to modify Pang et al. to arrive at the presently claimed invention. Applicants respectfully submit that the Gosh et al. reference fails to make up for the deficiencies of Pang et al.

Referring to the Pang et al. reference, this reference discloses a simulation server that allows a mask image to be uploaded via the Internet from a client site. Referring to column 27, first paragraph of Pang et al., the simulation server “outputs results in the form of simulations, one-dimensional plots, or reports.” There is no indication in the Pang et al. reference that the data in the mask image file is converted into data having a different form as in the present invention. In Pang et al., the mask image file is merely used to run a simulation or to generate a one-dimensional plot or a report on the defects in the mask image file. In view of this,

Applicants submit that the mask image file of Pang et al. is not converted into a different form as in the present invention but is merely used to run a simulation or generate a report.

In the Examiner's Office Action, the Examiner asserts that Pang et al. discloses primary data in the form of a mask image being converted into secondary data in the form of a simulation image. However, the Examiner then states "Pang [et al.] fails to disclose having a second form different from the first form." This comment from the Examiner is not understood, since it appears to be contradictory to the Examiner's first statement that the simulation image is secondary data. In any event, Applicants submit that the Pang et al. reference fails to disclose converting primary data into secondary data for the above-mentioned reasons. If the Examiner believes otherwise, then clarification is requested.

With regard to the Gosh et al. reference, the Examiner asserts that this reference discloses converting primary data into secondary data as recited in claim 1 and primary and secondary data that are compatible with first and second software programs, respectively, as recited in claim 15. Applicants do not agree with the Examiner's position. Gosh et al. discloses a network-based design system that enables a product to be designed with input from numerous parties. However, there is no indication in Gosh et al. that the central processing unit does anything other than allow a design program to be executed by the various parties independently. Therefore, Applicants submit that the Gosh et al. reference is similar to Pang et al. in that there is no conversion of data occurring in the central processing unit.

Referring to column 5, lines 25-41 of Gosh et al., it is disclosed that a mold for making a product can be designed in the network-based design system. However, this mold design is simply the use of, for example, a CAD, CAE or CAM software in the central processing unit by

multiple parties. There is no indication that the data generated for one of the CAD, CAE or CAM software programs is converted into a different form to be used by another one of the CAD, CAE or CAM software programs as would be necessary to meet independent claims 1 or 15 of the present invention.

Referring to column 8, lines 36-53 of Gosh et al., it is clearly disclosed that the network-based design system can be used to create a mold. In addition, it is stated “[t]ransfer of the mold design can be performed by any appropriate process, such as but not limited to, from a computer-aided design in the network based design system to an associated computer-numerical control (CNC).” However, this portion of Gosh et al. does not specifically disclose that the data generated in the central processing unit (mold design data that is compatible with one of CAD, CAE or CAM software programs) is “converted” into a different form within the central processing unit itself. This portion of Gosh et al. merely indicates that the data generated in the central processing unit can be “transferred” to a CNC machine for execution.

With regard to dependent claims 2, 4-14, 16 and 17, Applicants respectfully submit that these claims are allowable due to their respective dependence upon allowable independent claims 1 and 15, as well as due to additional recitations in these claims.

In view of the above amendments and remarks, Applicants respectfully submit that claims 1, 2 and 4-17 clearly define the present invention over the references relied on by the Examiner. Accordingly, reconsideration and withdrawal of the Examiner’s rejection under 35 U.S.C. § 103 are respectfully requested.

**CONCLUSION**

Since the remaining references cited by the Examiner have not been utilized to reject the claims, but merely to show the state-of-the-art, no further comments are deemed necessary with respect thereto.

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Paul C. Lewis, Registration No. 43,368 at (703) 205-8000 in the Washington, D.C. area.

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Respectfully submitted,

By 

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